

SILAS P. RICE, et al.	*	NO. 29,770 EQUITY
PLAINTIFF	*	IN THE
VS.	*	CIRCUIT COURT
COLEMAN J. LIDIE, III	*	FOR
DEFENDANT	*	FREDERICK COUNTY, MARYLAND

\* \* \* \* \*

ANSWER TO AMENDED BILL OF COMPLAINT FOR INJUNCTIVE RELIEF

Coleman J. Lidie, III and Nancy L. Lidie, Defendants, by Peyton Paul Phillips, their attorney, say:

1. That they admit the allegations of Paragraph First.
2. That they are without knowledge as to the allegations of Paragraph Second.
3. That they are without knowledge as to the allegations of Paragraph Third.
4. That they deny the allegations of Paragraph Fourth.
5. That they deny the allegations of Paragraph Fifth.
6. That they deny the allegations of Paragraph Sixth.
7. That they deny the allegations of Paragraph Seventh.
8. That they admit the allegations of Paragraph Eighth.
9. That they deny the allegations of Paragraph Ninth.

Further answering, that prior to May, 1979, there existed only a number of meandering logging trails coming down off the mountainside through our property. That said trails were only approximately three feet wide and could only accomodate a pedestrian or horse for the purposes of dragging wood down off the mountain. That in May, 1979, the plaintiff, Silas P. Rice, entered upon our real property with heavy equipment and created a road wide enough to accomodate a motor vehicle. That in the course of establishing such road, the plaintiffs caused numerous trees to be cut down and large stones to be pushed to the side. That the plaintiffs also removed a survey marker. That the creation of said road has increased the water run-off down across our property, causing land erosion and other substantial and costly